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### *Class Counsel*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

*Frito-Lay North America, Inc. "All Natural" Litigation* ) **PLAINTIFFS' NOTICE OF MOTION AND PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF THE CLASS**

PLEASE TAKE NOTICE that on November 14, 2017, at 11:00 a.m., in the United States District Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, before the Honorable Roslynn R. Mauskopf, Plaintiffs Julie Gengo, Chris Shake, Valarie Zuro, and Deborah Lawson,

on behalf of themselves and the members of the proposed Settlement Class will, and hereby do, move the Court to (1) grant final approval of the Settlement as fair, reasonable, and adequate; (2) confirm certification of the Class pursuant to Rules 23(a) and (b)(2) of the Federal Rules of Civil Procedure for the purpose of the Settlement; and (3) enter the Final Judgment and Order in the forms substantially similar to the previously-filed Exhibits F and G to the Settlement Agreement (ECF No. 100-2).

This motion is based upon this Notice of Motion; the accompanying Memorandum of Law In Support of Plaintiffs' Motion for Final Approval of Settlement; the Joint Declaration of Ariana J. Tadler and Michael R. Reese In Support of (1) Plaintiffs' Motion for Final Approval of Settlement and (2) Plaintiffs' Motion for Awards of Attorneys' Fees, Expenses, and Case Contribution Awards; all the pleadings and documents on file in this action; and such other matters as may be presented at or before the hearing.

Plaintiffs advise the Court that this Motion is unopposed by Defendant.

DATED: October 3, 2017

Respectfully submitted,

**MILBERG LLP**

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